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IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

**FILED**

NOV 25 2020

Richard Glossip, et. al.,

PLAINTIFFS,

vs,

Randy Chandler, et. al.,

DEFENDANTS,

NO. 14-CV-665-F

Wade Lay as MOVANT

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT, WESTERN DIST. OKLA.  
BY                      DEPUTY

PLAINTIFF WADE LAY'S MOTION FOR THIS COURT TO  
PROVIDE DECLARATORY RELIEF TO ENFORCE A PRIOR  
ORDER FOR WADE LAY TO RECEIVE PERTINENT AND  
CRITICAL DOCUMENTS AS PRO-SE COUNSEL FROM VARI-  
OUS PARTIES AND THIS COURT

DATE: 11/23/2020

PRO-SE

WADE GREEN LAY #516263

OKLAHOMA STATE PENITENTIARY

P.O. BOX 91

MCALISTER, OKLA. 74502

BRIEF BACKGROUND:

THIS CASE HAS ITS ORIGINS IN THE 8<sup>TH</sup> ARTICLE OF AMENDMENT. IN 2014, OKLAHOMA STATE PENITENTIARY (O.S.P.) CARRIED OUT WHAT MANY HAVE CHARACTERIZED AS A BOTCHED EXECUTION OF PRISONER (MR. LOCKET). AFTER PRISONER (MR. WARNER) WAS EXECUTED MULTIPLE PRISONERS WITH VARIOUS COUNSEL, TO INCLUDE RICHARD GLOSSIP FILED THIS CIVIL RIGHTS ACTION CLAIMING THE OKLAHOMA DEPARTMENT OF CORRECTIONS (O.D.C.) EXECUTION PROTOCOLS VIOLATE THE RIGHT OF INDIVIDUALS TO BE FREE OF CRUEL AND UNUSUAL PUNISHMENT AS STATED IN THE EIGHTH AMENDMENT. WADE LAY ENTERED INTO AN AGREEMENT WITH THE LAW FIRM CROWELL MORING TO BE REPRESENTED IN THIS CASE. HOWEVER, CROWELL MORING FAILED TO FULFILL ITS PROMISED STIPULATION TO VISIT WADE LAY TO DISCUSS ALTERNATIVE SUBJECT MATTER SURROUNDING THE 8<sup>TH</sup> ARTICLE OF AMENDMENT; THE PLAINTIFF WADE LAY

TERMINATED HIS ASSOCIATION WITH CRAWELL MORING AND  
FILED HIS AMENDED COMPLAINT D10-5C.

THIS COURT ORDERED THE DEFENDANT'S COUNSEL AND THE  
PLAINTIFF'S COUNSEL TO PROVIDE TO WADE LAY ALL RELEVANT  
DOCUMENTS IN THIS CASE. WADE LAY AS CO-PLAINTIFF IS  
STILL ACTIVELY INVOLVED IN THIS CASE AS A DEATH ROW  
PRISONER.

LEGAL ARGUMENTS:

UNDER THE FEDERAL RULES OF CIVIL PROCEDURE, EVEN THOUGH  
THE COURT DISMISSED HIS AMENDED COMPLAINT, WADE LAY IS NOT  
EXCLUDED FROM ENTERING PLEADINGS IN THIS CASE. PURSUANT  
TO THE COURT'S ORDER THAT EVERY CONDEMNED PRISONER IS  
A PARTY TO THIS ACTION. (DOC NO. 261). THAT INTERACTION IS  
IMPOSSIBLE IF LAY IS DEPRIVED OF THE PERTINENT DOCUMENTS

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DEFINING THE PROGRESS OF THIS CIVIL ACTION.

ON WEDNESDAY 11/18/2020, THE O.S.P. LEGAL MAIL REP.

(CRYSTAL) REFUSED TO DELIVER TO WADE LAY A LEGAL DOC-

UMENT IN THIS CASE. APPROXIMATELY TWO WEEKS PRIOR

TO THIS DEPRIVATION O.S.P. MAIL ROOM RETURNED LEGAL

DOCUMENTS SENT TO WADE LAY TO CRANELL MORING,

OPENING THE PACKAGE PRIOR TO DELIVERY IN WADE LAY'S

PRESENCE. IN BOTH INSTANCES O.S.P. MAIL ROOM EMPLOYEES

ATTEMPTED TO CONCEAL THIS ACTION, EVEN DECEITFULLY

ATTEMPTING TO ACQUIRE A SIGNATORY APPROVAL ON 11/18/20,

YET WITHHOLDING THE DOCUMENTS.

ONE EXAMPLE MAY BE GIVEN TO SHOW THE DETRIMENTAL

NATURE OF THIS DEPRIVATION. IN DOC. NO. 335, (DELIVERED

BY THE SAME O.S.P. LEGAL MAIL REP.) ON PG. 5 OF 12,

F.N.  
X) ON OR ABOUT 01/27/2020.

PARAGRAPH NO. 27, THE DEFENDANTS CLAIM THE CIRCUM-  
STANCES SURROUNDING THE STAY OF EXECUTION BY  
GOVERNOR FALLIN OF RICHARD GLOSSIP ARE ERRONEOUS.  
THE INFORMATION SENT TO WADE LAY FROM CROWELL-  
MORING APPROXIMATELY (3) THREE WEEKS AGO, I.E.,  
ON OR ABOUT 11/02/20 IS CRITICAL TO THE PROPER  
ASSESSMENT OF THIS ISSUE, BUT O.S.P. LEGAL MAIL  
REPRESENTATIVES REFUSED TO DELIVER THE PACKAGE  
UNDER THE PRETENSE THAT INMATE RICHARD GLOSSIP  
WAS OFFENDED.

O.S.P. HAS VIOLATED O.D.O.C. POLICY REGULATIONS  
CONTROLLING THE PROPER HANDLING OF LEGAL MAIL, AND  
THE LAWS OF THE UNITED STATES AND PREVAILING PRECE-  
DENCE OF THE COURTS OF THE UNITED STATES. WADE LAY

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SUBMITS TO THIS COURT, THAT THIS ACTION BY O.S.D.  
MAIL ROOM IS SIMILAR TO, AND DERIVES FROM THE  
SAME SOURCE AS WADE LAY'S DENIAL OF EQUAL PROTECTION  
OF STATE LAW SURROUNDING HIS INABILITY TO PURCHASE  
PRODUCTS OTHER PRISONERS ARE ALLOWED. ADDITIONALLY,  
THE MULTIPLE ATTACKS, SUCH AS THE FALSE CLAIM BY A  
PRISONER ON 09/16/20, WHERE THE PRISONER  
CLAIMED WADE LAY SPIT ON HIM, AN IMPOSSIBLE  
THING TO DO IN THIS H-UNIT, ARE RELATED. THAT IS  
TO SAY, THE INCENTIVE TO TARGET WADE LAY, COMES  
FROM THE SAME SOURCE. THE PREJUDICE COMES  
FROM O.D.O.-C. OFFICIALS WHO MAINTAIN A VENDETTA,  
AND THAT A PLETHORA OF EVIDENCE CONFIRMS THIS FACT!  
FOR THESE REASONS IT IS NECESSARY TO ASK THIS

COURT TO REITERATE ITS PREVIOUS ORDER, BUT TO  
DIRECT THE ORDER FOR WADE LAY TO RECEIVE ALL  
PERTINENT DOCUMENTS RELATED TO THIS CASE TO  
THE O.D.O.C. AND O.S.P.

RESPECTFULLY SUBMITTED

WADE LAY, U.S.A.

P.O. BOX 97

MCALISTER, OKLA. 74502